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AGENCY SOLUTIONS.COM, LLC d.b.a.  
12 HEALTHCONNECT SYSTEMS

13 IN THE UNITED STATES DISTRICT COURT  
14 EASTERN DISTRICT OF CALIFORNIA  
15 FRESNO DIVISION

17 AGENCY SOLUTIONS.COM, LLC d.b.a.  
HEALTHCONNECT SYSTEMS,  
18 Plaintiff,  
19 v.  
20 THE TRIZETTO GROUP, INC.,  
21 Defendant,  
22

Civil Action No. 11-cv-01014-AWI-GSA

**STIPULATION AND [PROPOSED]  
ORDER TO STAY DISTRICT  
COURT PROCEEDINGS PENDING  
RESOLUTION OF PLAINTIFF'S  
APPEAL OF THIS COURT'S ORDER  
ON MOTION FOR PRELIMINARY  
INJUNCTION**

**Judge: Hon. Anthony W. Ishii, Court 2**

1 WHEREAS, on September 13, 2011, this Court entered an Order denying Plaintiff  
2 Agency Solutions.com, LLC d.b.a. HealthConnect Systems (HCS)'s Motion for Preliminary  
3 Injunction (Dkt.# 61, Memorandum Opinion and Order on Plaintiff's Motion for Preliminary  
4 Injunction, herein "Order on PI Motion");

5 WHEREAS, on October 11, 2011, HCS filed a Notice of Appeal appealing to the Ninth  
6 Circuit the Order on PI Motion (Dkt.# 65);

7 WHEREAS, HCS and Defendant The TriZetto Group, Inc. (TZG), agree that it is  
8 appropriate to stay proceedings in this Court pending resolution of HCS's appeal of the Order on  
9 PI Motion – provided that the dates set forth in the current Scheduling Order (Dkt.# 64) are  
10 adjusted to take into account the duration of such stay;

11 NOW, THEREFORE, IT IS HEREBY STIPULATED BY THE UNDERSIGNED THAT:

12 1. All proceedings in this action in this Court are stayed, effective immediately,  
13 pending resolution of HCS's appeal of the Order on PI Motion; specifically, the stay will  
14 remain in effect until the Ninth Circuit issues its Mandate on HCS's appeal of the Order  
15 on PI Motion.

16 2. The dates set forth in the current Scheduling Order will be extended, upon  
17 resolution of the appeal, by approximately the same number of days that this stay remains  
18 in effect.

19 3. The parties shall file a joint report setting forth a new proposed schedule for this  
20 action within 14 days after the Ninth Circuit issues its Mandate on the appeal.

21  
22 **IT IS SO STIPULATED**

23 Dated: October 13, 2011.

MANATT, PHELPS & PHILLIPS, LLP

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25 By: /s/ Ronald S. Katz  
Ronald S. Katz

26 *Attorneys for Plaintiff Agency Solutions.com,*  
27 *LLC d.b.a. HealthConnect Systems*

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Dated: October 13, 2011.

SHEPPARD, MULLIN, RICHTER &  
HAMPTON LLP

By: /s/ Brian M. Daucher (as authorized on 10/13/11)  
BRIAN M. DAUCHER

*Attorneys for Defendant*  
*THE TRIZETTO GROUP, INC.*

**ORDER**

IT IS SO ORDERED.

Dated: October 14, 2011

  
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CHIEF UNITED STATES DISTRICT JUDGE